United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	ID R 0 5 I 3 1 4	1 9 0 6 1 3	~	R	2

Remarks

21 ____ 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 1 0 69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Young Living Farm 701 North Fork Coon Creek Road St. Maries, ID 83861	10:15am / 6/13/19	February 3, 2018
	Exit Time/Date	Permit Expiration Date
	2:08pm / 6/13/19	June 4, 2020

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*
Kevin Sagers, Sr. Farm Manager Phone: 208-245-2745 Fax: 208-245-3011 Email: ksagers@youngliving.com	SIC 2899 - Chemical Preparations NAICS 325199 - Other Basic Organic Chemical Manufacturing Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP) Sector C – Chemical and Allied Products Manufacturing, and Refining Located on the Coeur d'Alene Reservation
Name, Address of Responsible Official/Title/Phone and Fax Number Kevin Sagers, Sr. Farm Manager 701 North Fork Coon Creek Road, St. Maries, ID 83861 Phone: 208-245-2745, Fax: 208-245-3011 Email: ksagers@youngliving.com	Contacted ☑ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

✓ Permit	✓ Self-Monitoring Program	☐ Pretreatment	☐ MS4
✓ **Records/Reports**	☐ Compliance Schedules	✓ Pollution Prevention	
✓ Facility Site Review	☐ Laboratory	✓ Storm Water	
✓ Effluent/Receiving Waters	✓ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	✓ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes SEV Description

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Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Matt Vojik	EPA / ECAD / 206-553-0716	6/21/2019
Signature of Management Q A Reviewer	Agency/Office/Phone ~~and Fax Numbers~~	Date
	EPA/ECAD/2065536708	8.26.19

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

NPDES Inspection Report

Permit # IDR05I314

Young Living Farm

St. Maries, ID

June 13, 2019

Prepared by:

Matt Vojik
Environmental Protection Agency (EPA), Region 10 (R10)
Enforcement & Compliance Assurance Division (ECAD)
Water Enforcement & Field Branch (WEFB)
Field, Data & Drinking Water Enforcement Section (FDDWES)

Contents

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Kevin Sagers or from observations during the inspection.)

I. Facility Information

Facility Name:	Young Living Farm
Facility Operator:	Young Living Farm
Tribal Land Owner:	Coeur d'Alene Reservation
Physical/Mailing Address:	701 North Fork Coon Creek Road, St. Maries, ID 83861
Lat/Long:	47.304626, -116.730992
Facility Contacts:	Kevin Sagers, Sr. Farm Manager Phone: 208-245-2745 Fax: 208-245-3011 Email: ksagers@youngliving.com
Permit Number:	IDR05I314
NAICS Code: SIC Code:	325199 – Other Basic Organic Chemical Manufacturing 2899 - Chemical Preparations
Receiving Water:	North Fork Coon Creek, part of the Benewah Creek Watershed

II. Inspection Information

Inspection Date:	June 13, 2019
Inspectors:	Matt Vojik, EPA/R10/ECAD/WEFB/FDDWES
Arrival Time:	10:15 AM
Departure Time:	2:08 PM
Weather:	Sunny
Purpose:	To determine whether the facility is in compliance with their National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act (CWA).

III. Permit Information

The facility is permitted to discharge under the Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP), Sector C (Chemical and Allied Products Manufacturing, and Refining) with the tracking number IDR05I314. The facility's coverage under the MSGP became effective on February 3, 2018. The MSGP has an expiration date of June 3, 2020.

IV. Background

The facility consists of a farm, mechanical shop and distillery for processing essential oil from lavender and other herbs. Most industrial activities take place from late spring through early fall. Young Living[1] is headquartered in Lehi, Utah, with offices in Australia, Europe, Canada, Japan, and Singapore, and farms around the world.

On January 3, 2014, the EPA filed a Consent Agreement and Final Order with a $30,000 penalty resolving violations of the CWA by the facility for discharging pollutants without a permit or authorization. On April 5, 2015, the EPA also settled with the facility for violations of the Safe Drinking Water Act for operating an underground injection well that received untreated fluids from open drains on a fueling pad. The facility agreed to close the injection well and pay a $27,440 penalty.

V. Inspection Chronology

On May 31, 2019, I contacted Mr. Scott Fields, Water Resource Program Manager for the Coeur d'Alene Tribe, to discuss the proposed inspection on the Coeur d'Alene Reservation. I arrived at the facility at 10:15am on June 13, 2019 to conduct an unannounced inspection. I presented my credentials to Mr. Kevin Sagers, Sr. Farm Manager, and provided him an EPA Small Business Resources Information Sheet. I was accompanied throughout the inspection by Mr. Sagers. I was not denied access to the facility.

I began the inspection with a brief opening conference with Mr. Sagers in the main office. I took a tour of the facility and conducted a file review. We ended with a closing conference to discuss observations and next steps.

VI. Opening Conference

Mr. Sagers has worked at the facility for six years. He said that active farming operations covered approximately 75 to 80 of the facility's 200 acres. The workforce consists of six employees year-round and increases to approximately 15 to 16 employees in the summer. Distillation typically starts in July and lasts for 15 to 30 days. The facility produces approximately ten gallons of lavender oil and five gallons of melissa oil per year.

[1] https://www.youngliving.com/en_US/company/about

VII. Site Review

Mr. Sagers took me on a tour of the facility. Site maps appear in **Attachment A** and a photograph log appears in **Attachment B**. I followed the path of flow from the north end of the facility to an unnamed pond (**Photo 1**), where Mr. Sagers said the facility has been working with the U.S. Army Corps of Engineers on plans to build a reservoir. Downstream of the unnamed pond, I inspected Pond 1a (**Photo 2**), Pond 2 and Pond 3 (**Photo 3**).

In the northwest portion of the property, I observed a stream bed (**Photos 4 & 5**) in a wetland area. Mr. Sagers said that the facility does not farm within 70 feet of the stream bed. The streambed and the ponds were located upstream of Pond 4 (**Photo 6**), which discharges through an outlet pipe (**Photo 7**) to a stream bank (**Photo 8**) that the facility has identified as Outfall 002. I observed flow in the stream, which continues to North Fork Coon Creek, but I did not observe a discharge from the outlet pipe of Pond 4 at the time of the inspection. Mr. Sagers said that Pond 4 is used for irrigation and cooling during distillation. The cooling water flows from Pond 4 through the distillery to Pond 1a. Mr. Sagers said that Pond 4 is typically drawn down in the summer and refills to the point of discharge around January or February.

On the south side of the distillery building, I observed a drainage channel (**Photo 9**) upstream of Outfall 001 (**Photo 10**), which was upstream of another drainage channel (**Photo 11**) that directs flow to North Fork Coon Creek.

In the southwestern portion of the facility, I observed cleared fields (**Photo 12**), a scrap metal accumulation area (**Photo 13**) and a soil stockpile area (**Photo 14**).

In the distillery building, I inspected the boiler and blowdown water collection tank (**Photo 15**). Mr. Sagers said that the blowdown water and floral water, which is used in the cooking process, are applied to the facility's roads for dust control. Floral water and reflux water, which comes from the bottom of the cooker, are collected in tanks (**Photo 16**) located in the basement of the distillery. Reflux water is applied to compost piles (**Photo 17**) located northwest of Pond 3. Mr. Sagers said the facility has obtained a permit for wastewater reuse from the Idaho Department of Environmental Quality (IDEQ). He said that the facility also applies a fish emulsion fertilizer, and that the facility does not use pesticides or herbicides.

VIII. File Review

I reviewed the following records:

- Stormwater Pollution Prevention Plan (SWPPP), dated April 20, 2018
- Spill Prevention, Control and Countermeasures (SPCC) Plan, dated November 22, 2017
- Discharge Monitoring Reports (DMRs) and associated analytical records from SVL Analytical Laboratory
- Notice of Intent (NOI) to discharge under the MSGP, certified on January 29, 2019
- Training records for 2018
- Annual report for 2018
- Letter of additional monitoring requirements from the EPA, dated February 26, 2018

IX. Areas of Concern

I noted the following areas of concern:

A. Unreported Outfall and Monitoring Data

The facility's NOI, annual report and DMRs have been certified to be "true, accurate, and complete" in accordance with Subsection B.11.E. of Appendix B of the MSGP.
AND
Part 7.4 of the MSGP states that "all monitoring data collected pursuant to Part 6.2 must be submitted to EPA using EPA's NetDMR system..."

During the inspection, I reviewed analytical records for a sampling event on December 21, 2018. I noted that these records identified samples collected at the "east" outfall and at the "west" outfall. However, the DMR data for this monitoring period only reflected the analytical results for the west outfall. After the inspection, I noted that the facility's NOI (certified on 01/29/2019) identified only one outfall. I also noted that the corresponding NetDMR included data fields for only one outfall, which could explain why the second set of monitoring results were not entered into NetDMR.

After the inspection, I also noted that the facility's 2018 annual report described benchmark monitoring activities for outfall 002, but stated that "no samples were collected from outfall 001." This statement appears inconsistent with the analytical record of samples collected from two separate outfalls on December 21, 2018.

B. Missing DMRs

Part 7.4 of the MSGP states that "for any of your monitored outfalls that did not have a discharge within the reporting period, using NetDMR you must report using a "no data" or "NODI" code for that outfall no later than 30 days after the end of the reporting period."

At the time of the inspection, I noted that the facility's DMR data indicated that DMRs had not been submitted for multiple monitoring periods. Mr. Sagers asked how to report monitoring data for periods of no discharge, and I referred him to Part 7.4 of the MSGP. I also referred him to Part 6.1.6 of the MSGP, which states that "required monitoring events may be distributed during seasons when precipitation occurs... You must still collect the required number of samples."

C. Ambient Temperature Monitoring

A letter from the EPA dated February 26, 2018 identifies "ambient temperature in the stream" as an additional monitoring requirement per Part 6.2.5 of the MSGP.

Mr. Sagers said that the facility has not conducted ambient temperature monitoring.

D. pH Sample Holding Time

Subsection B.10.D. of Appendix B of the MSGP states that "monitoring must be conducted according to test procedures approved under 40 CFR Part 136…" which specifies a 15-minute holding time for pH analysis.

AND

Subsection B.10.A. of Appendix B of the MSGP states that "samples and measurements taken for the purpose of monitoring must be representative of the volume and nature of the monitored activity."

I noted that the facility sends samples to SVL Analytical Laboratory for analysis of monitoring parameters that include pH. Due to the distance from the facility to SVL (which has locations in Kellogg, ID and Coeur d'Alene, ID), I noted that it is not possible for the lab to analyze pH within a 15-minute holding time. I advised Mr. Sagers to analyze pH onsite to ensure that the holding time is met, and pH measurements are representative of the monitored activity.

E. Representative Sampling Point

Part 3.2.1 of the MSGP states that "you must collect a stormwater sample from each outfall… in such a manner that the samples are representative of the stormwater discharge."

AND

Subsection B.10.A. of Appendix B of the MSGP states that "samples and measurements taken for the purpose of monitoring must be representative of the volume and nature of the monitored activity."

During the inspection, Mr. Sagers identified a point on the bank of a stream (**Photo 8**) as the sampling location for Outfall 002. To ensure that samples are representative of the industrial stormwater discharge from the facility, I reminded Mr. Sagers to sample at a point before the discharge commingles with non-industrial downstream flows. If necessary, I pointed out that the facility could consider an alternate sampling point such as the outlet pipe of Pond 4 (**Photo 7**).

F. Erosion and Sediment Controls

Part 2.1.2.5 of the MSGP states that "you must minimize erosion by stabilizing exposed soils at your facility in order to minimize pollutant discharges… You must also use structural and non-structural control measures to minimize the discharge of sediment."

In the southwestern portion of the facility, I observed a soil stockpile (**Photo 14**) located on the edge of slope without stabilization or control measures to minimize the discharge of sediment from the site.

G. Open Dumpster

Part 2.1.2.2 of the MSGP states: "Keep all dumpster lids closed when not in use. For dumpsters and roll off boxes that do not have lids and could leak, ensure that discharges have a control (e.g., secondary containment, treatment)."

During the inspection, I observed a dumpster (**Photo 13**) without a lid or other means to control potential leaks. The dumpster was located in a scrap metal accumulation area in the southwestern portion of the facility.

H. Dust Generation

Part 2.1.2.10 of the MSGP states that "you must minimize generation of dust and off-site tracking of raw, final, or waste materials in order to minimize pollutant discharges."

During the inspection, I observed dust generated from truck traffic on dirt roads within the facility. Mr. Sagers said that there was more truck traffic and dust than usual because the facility was in the process of constructing a new house on the property.

X. Closing Conference

I held a closing conference with Mr. Sagers. We discussed the areas of concern identified during the inspection and I gave a brief overview of the post-inspection process. I thanked him for his time and assistance.

Report Completion Date: 8/23/2019

Lead Inspector Signature:

ATTACHMENT A – Site Maps

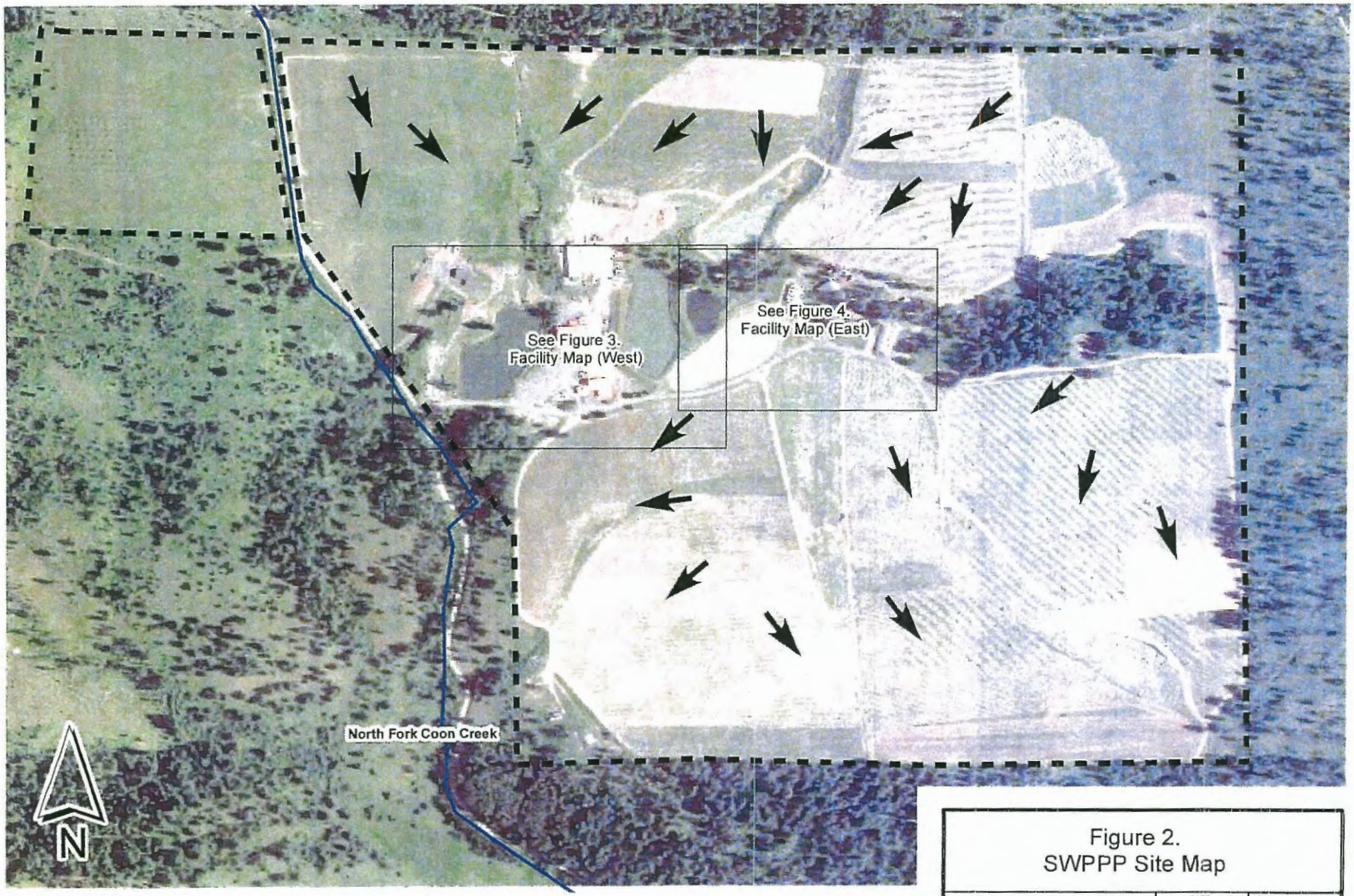

Figure 2.
SWPPP Site Map

Young Living Lavender Farms 701 N. Fork Coon Creek Rd. St. Maries, Idaho	DATE 10/5/2017	PROJECT NUMBER 150485
	BROWN and CALDWELL 950 W. Bannock St, Suite 350 Boise, ID 83702	

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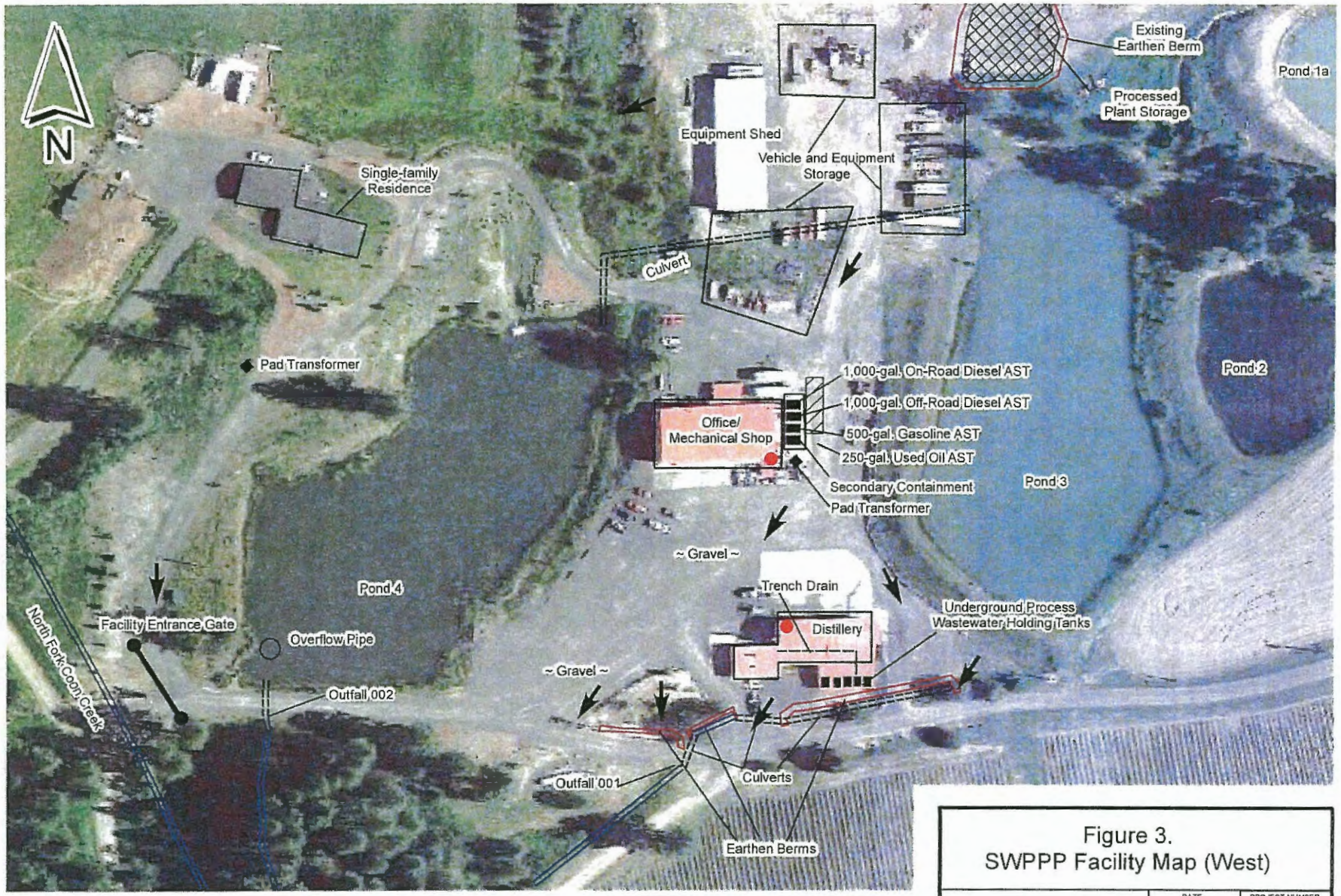

Figure 3.
SWPPP Facility Map (West)

	DATE	PROJECT NUMBER
Young Living Lavender Farms 701 N. Fork Coon Creek Rd. St. Maries, Idaho	10/5/2017	150485
	BROWN and CALDWELL 950 W. Bannock St. Suite 350 Boise, ID 83702	

Aerial Imagery Source: maps.google.com (Image date 6/30/2017)

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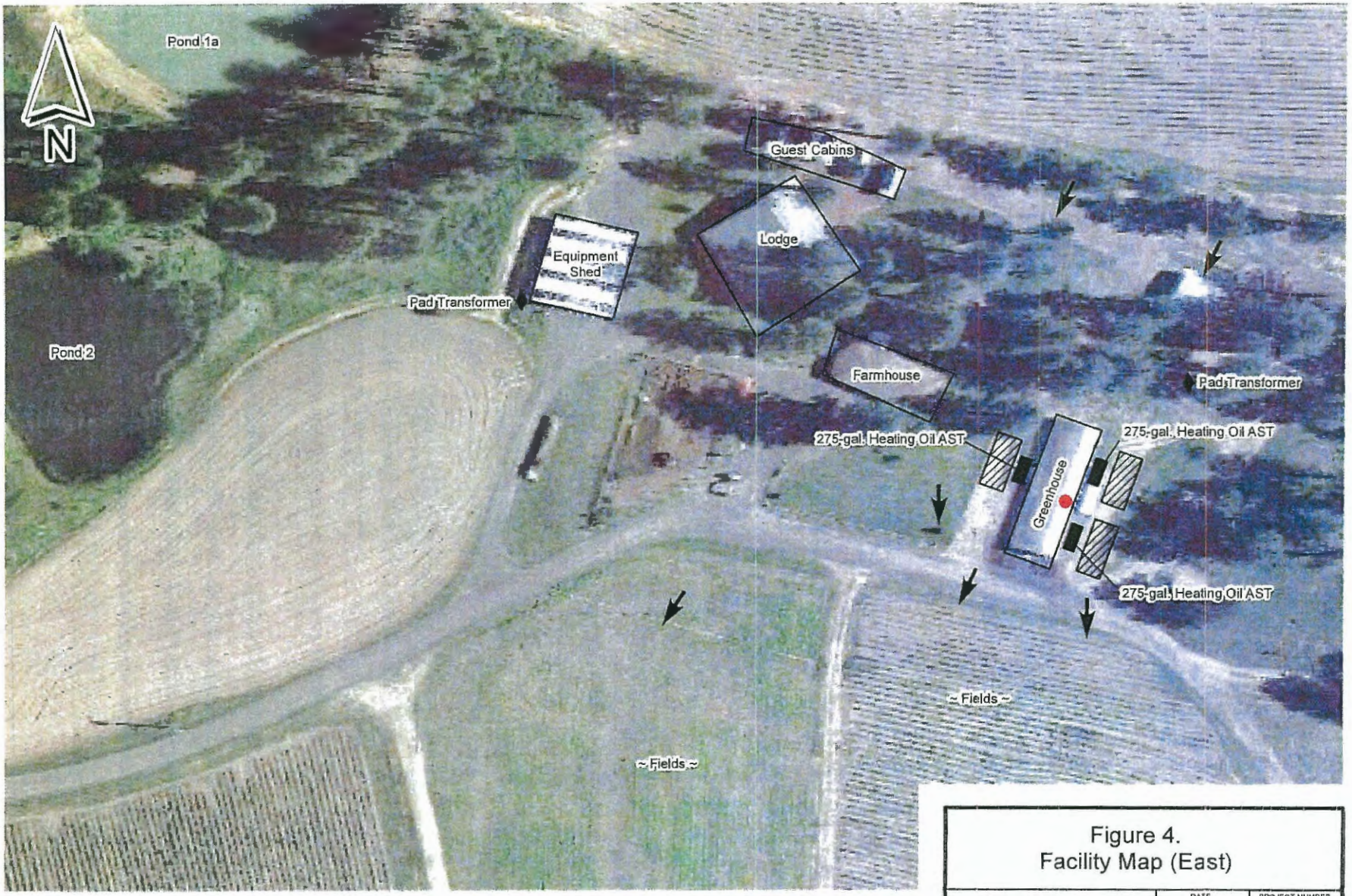

Figure 4.
Facility Map (East)

Young Living Essential Oils 701 N. Fork Coon Creek Rd. St. Maries, Idaho	DATE 10/5/2017	PROJECT NUMBER 150485
	BROWN and CALDWELL 950 W. Bannock St, Suite 350 Boise, ID 83702	

Aerial Imagery Source: maps.google.com (Image date 6/30/2017)

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ATTACHMENT B – Photograph Log

(Photographs were taken by Matt Vojik on June 13, 2019 with a Panasonic DMC-FH25 camera)

Photo 1 / P1050166 – Northerly view of pond located upstream of Pond 1a

Photo 2 / P1050165 – Southwesterly view of Pond 1a

Photo 3 / P1050156 – Southerly view of Pond 3

Photo 4 / P1050148 – Northerly view of the stream bed in the northwest portion of the facility

Photo 5 / P1050149 – Southerly view of the stream bed in the northwest portion of the facility

Photo 6 / P1050159 – Northerly view of the outlet of Pond 4

Photo 7 / P1050158 – Detail view of the outlet of Pond 4

Photo 8 / P1050160 – Southerly view of the stream that receives flow from Pond 4 (Outfall 002)

Photo 9 / P1050169 – Easterly view of drainage channel upstream of Outfall 001

Photo 10 / P1050167 – Outfall 001

Photo 11 / P1050168 – Southerly view of drainage channel downstream of Outfall 001

Photo 12 / P1050171 – Northeasterly view of the southern portion of the facility

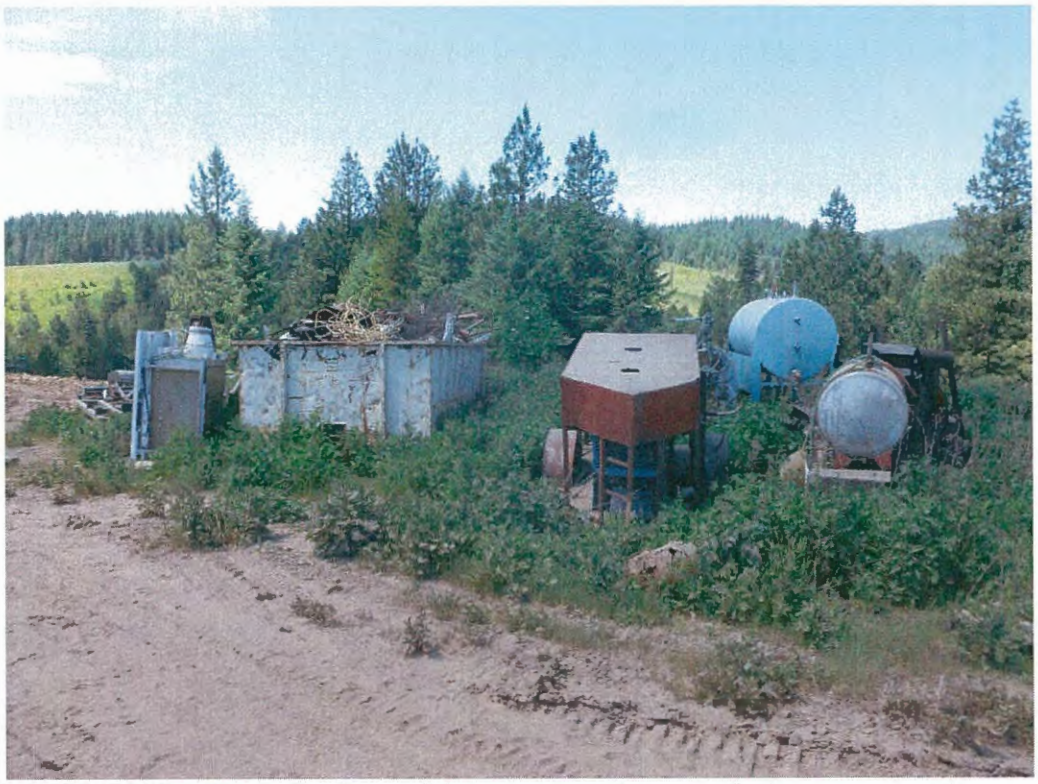

Photo 13 / P1050175 – Westerly view of the scrap metal accumulation area near the southwestern border of the facility

Photo 14 / P1050178 – Northerly view of the soil stockpile area near the southwestern border of the facility

Photo 15 / P1050182 – Boiler (left) and boiler blowdown water collection tank (right)

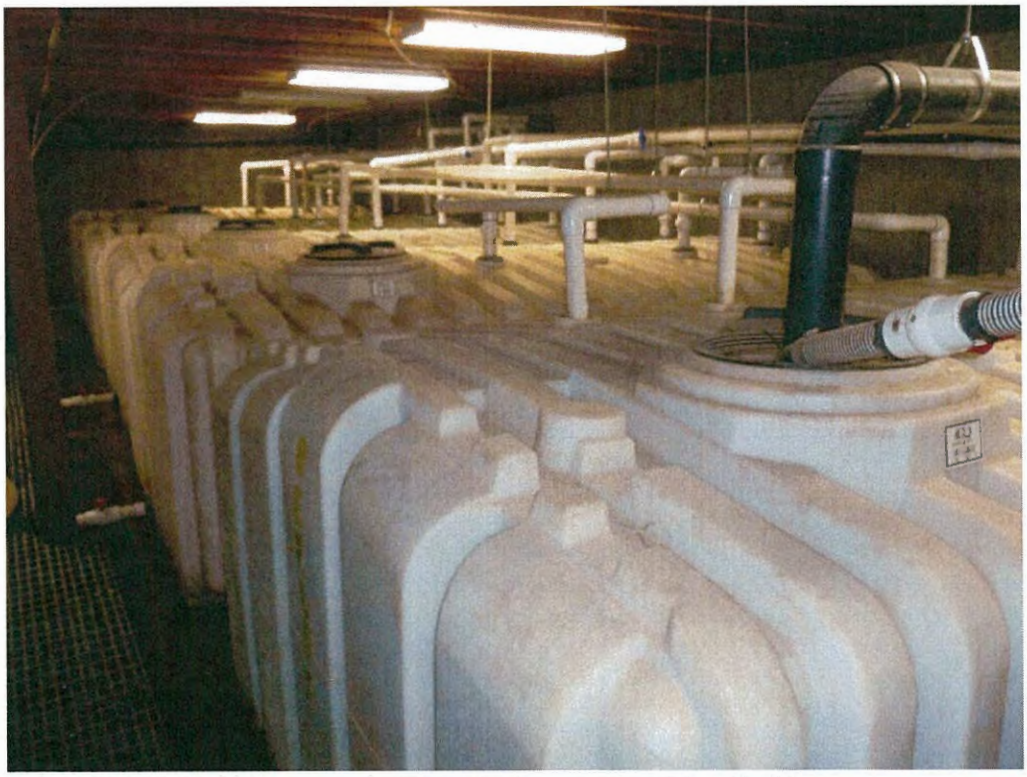

Photo 16 / P1050187 – Wastewater tanks in the basement of the distillery

Photo 17 / P1050162 – Northerly view of compost piles (arrows) located northwest of Pond 3

Complete list of photographs taken during the inspection:

- P1050147 – Site map
- P1050148 – Northerly view of the stream bed in the northwest portion of the facility
- P1050149 – Southerly view of the stream bed in the northwest portion of the facility
- P1050150 – Northerly view of the wetland area in the northwest portion of the facility
- P1050151 – Southerly view of the wetland area in the northwest portion of the facility
- P1050152 – Westerly view from the north end of Pond 4
- P1050153 – Southwesterly view of Pond 4
- P1050154 – Southwesterly view of the irrigation pump at Pond 4
- P1050155 – Southeasterly view of accumulated sediment in the northeast portion of Pond 4
- P1050156 – Southerly view of Pond 3
- P1050157 – Fertilizer tote
- P1050158 – Detail view of the outlet of Pond 4
- P1050159 – Northerly view of the outlet of Pond 4
- P1050160 – Southerly view of the stream that receives flow from Pond 4 (Outfall 002)
- P1050161 – Northerly view of compost piles located north of Pond 3
- P1050162 – Northerly view of compost piles located northwest of Pond 3
- P1050163 – Northwesterly view toward Pond 3 (left) and Pond 2 (right)

- P1050164 – Southwesterly view of Pond 1a
- P1050165 – Southwesterly view of Pond 1a
- P1050166 – Northerly view of pond located upstream of Pond 1a
- P1050167 – Outfall 001
- P1050168 – Southerly view of drainage channel downstream of Outfall 001
- P1050169 – Easterly view of drainage channel upstream of Outfall 001
- P1050170 – Easterly view of drainage channel upstream of Outfall 001
- P1050171 – Northeasterly view of the southern portion of the facility
- P1050172 – Northeasterly view of the southern portion of the facility
- P1050173 – Easterly view of the southern portion of the facility
- P1050174 – Westerly view of drainage channel downstream on the southwestern border of the facility
- P1050175 – Westerly view of the scrap metal accumulation area near the southwestern border of the facility
- P1050176 – Southwesterly view of the soil stockpile area near the southwestern border of the facility
- P1050177 – Southerly view of the soil stockpile area near the southwestern border of the facility
- P1050178 – Northerly view of the soil stockpile area near the southwestern border of the facility
- P1050179 – Southerly view of the soil stockpile area near the southwestern border of the facility
- P1050180 – Southeasterly view of the facility from the vicinity of the greenhouse
- P1050181 – Southwesterly view of the facility from the vicinity of the greenhouse
- P1050182 – Boiler (left) and boiler blowdown water collection tank (right)
- P1050183 – Location of capped floor drains in the maintenance shop
- P1050184 – Page 1 of an EPA letter describing additional monitoring requirements
- P1050185 – Page 2 of an EPA letter describing additional monitoring requirements
- P1050186 – DMR for the monitoring period from 10/30/18 to 01/29/19
- P1050187 – Wastewater tanks in the basement of the distillery
- P1050188 – Distilling equipment
- P1050189 – Wastewater land application log
- P1050190 – Detail view of the label on a tote of fertilizer